

Exhibit I

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

LINDA ZIMMERMAN, AN
INDIVIDUAL,

PLAINTIFF,

VS.

AUTOZONE INC., ET AL.,

DEFENDANTS.

CERTIFIED
ORIGINAL

CASE NO. BC720153

VOLUME II

VIDEOTAPED DEPOSITION OF WILLIAM LONGO, PH.D.

MAY 12, 2020

SUWANEE, GEORGIA

JOB NO. 300655

REPORTED BY KRISTIN VARGAS, CSR NO. 11908, RPR

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA

2 FOR THE COUNTY OF LOS ANGELES

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5 LINDA ZIMMERMAN, AN)
INDIVIDUAL,)

6 PLAINTIFF,)

CASE NO. BC720153

7 VS.)

8 AUTOZONE INC., ET AL.,)

9 DEFENDANTS.)
10 _____)

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13 DEPOSITION OF WILLIAM LONGO, PH.D., THE WITNESS, TAKEN
14 REMOTELY ON BEHALF OF THE DEFENDANTS, AT SUWANEE, GEORGIA,
15 ON TUESDAY, MAY 12, 2020, AT 7:11 A.M., BEFORE KRISTIN
16 VARGAS, CSR NO. 11908, RPR.
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1 APPEARANCES OF COUNSEL:

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1 me that PLM then is going to have trouble resolving
2 chrysotile in that Chinese talc without your heavy
3 liquid separation at very low concentrations?

4 A At very low concentrations, that would be
5 correct. You would have to define what very low
6 concentrations are. At a concentration of what was
7 found in Titley, it does not have a problem using our
8 system.

9 Q What do you mean by your system?

10 A Well, we have an enhanced objective lens that
11 gives you better resolution to discriminate between the
12 fibers and it gives better resolution on the dispersion
13 staining. And we have the high definition monitor that
14 allows you to increase the size and be able to adjust
15 your focus a little bit easier.

16 On a regular PLM setup with a PLM analyst
17 that's not experienced in looking at this, he may never
18 find it. Maybe at the concentration we found, but I
19 don't know.

20 Q So would you agree that at least for Coalinga
21 type chrysotile, the PLM procedure is not reliable for
22 confirming chrysotile asbestos in a sample, whether it's
23 a bulk building product or even something like a talc
24 without doing your heavy liquid separation technique?

25 A No, I won't agree with that. If you're

1 STATE OF CALIFORNIA)
2) ss.
3 COUNTY OF LOS ANGELES)

4 I, Kristin Vargas, Certified Shorthand Reporter,
5 Certificate No. 11908 do hereby certify:

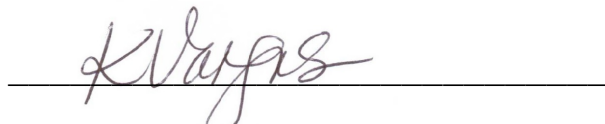
6 That prior to being examined, the witness named in the
7 foregoing deposition was by me duly sworn to testify to the
8 truth, the whole truth, and nothing but the truth;

9 That said deposition was taken down by me in shorthand
10 at the time and place therein named and thereafter reduced
11 to typewriting under my direction, and the same is a true,
12 correct, and complete transcript of said proceedings;

13 That if the foregoing pertains to the original
14 transcript of a deposition in a Federal Case, before
15 completion of the proceedings, review of the transcript
16 { } was { } was not required.

17 I further certify that I am not interested in the event
18 of the action.

19
20 Witness my hand this __15th__ day of __MAY__,
21 2020.

22 
23 KRISTIN VARGAS
24 Certified Shorthand Reporter
25 for the State of California